



IPAMS
Independent
Petroleum
Association
of
Mountain
States

620 Denver Club Building ♦ 518 17th Street ♦ Denver, Colorado 80202-4167 ♦ 303/623-0987 ♦ FAX: 303/893-0709

July 15, 1996

David Guzy, Chief
Rules and Procedures Staff
Minerals Management Service
P.O. Box 25165, MS
Denver, Colorado 80225-0165



OFFICERS & STAFF

Paul J. Zecchi
President
Carter G. Mathies
Vice President
Merle C. Chambers
Vice President
Karen Ostrander-Krug
Secretary
Greg C. Smith
Treasurer
Wyn L. Plank
Executive Director
G. Gagnon
Director of Technology Transfer
Barbara L. Widick
Director of Regulatory Affairs

Re: Comments-Proposed Rulemaking-Amendments to
Gas Valuation Regulations for Federal Leases-61
Fed Reg 25421

Dear Mr. Guzy:

The Independent Petroleum Association of Mountain States (IPAMS) and the Independent Petroleum Association of American (IPAA) respectfully request a 30 day extension in which to file comments to the proposed amendments to the gas valuation regulations for federal leases. It is the understanding of IPAMS/IPAA that API and RMOGA are also requesting an extension. We believe an additional 30 days is necessary to allow interested parties to comment adequately on these extremely important amendments.

In the interim IPAMS/IPAA strongly urges the Minerals Management Service to publish its proposed rule implementing FERC Order 636. The gas valuation rulemaking and the Order 636 rulemaking are interrelated and need to be considered concurrently.

We would appreciate a response to this request as soon as possible. A verbal response is certainly acceptable. Thank you for your consideration.

Very truly yours,

Barbara L. Widick
Director of Regulatory Affairs